

FOR COURT USE ONLY

Attorney or Party Name, Address, Telephone &amp; FAX Nos., State Bar No. &amp; Email Address

Zev Shechtman (State Bar No. 266280)

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Los Angeles, California 90067

Telephone: (310) 255-6100

☒ *Attorney for:* Alan Gomperts, Daniel Halevy, and Susan Halevy

UNITED STATES BANKRUPTCY COURT  
CENTRAL DISTRICT OF CALIFORNIA - LOS ANGELES DIVISION

In re:

SEATON INVESTMENTS, LLC, et al.,

CASE NO.: 2:24-bk-12079-VZ

Jointly Administered with Case Nos.:

2:24-bk-12080-VZ; 2:24-bk-12081-VZ; 2:24-bk-12082-VZ;  
2:24-bk-12091-VZ; 2:24-bk-12074-VZ; 2:24-bk-12075-VZ  
and 2:24-bk-12076-VZ

CHAPTER: 11

## AMENDED: NOTICE OF OBJECTION TO CLAIM

DATE: 9/10/2024

TIME: 11:00 a.m.

COURTROOM: 1368

PLACE: 255 East Temple Street

Los Angeles, CA 90012

Debtor(s).

1. TO (specify claimant and claimant's counsel, if any): Department of Treasury - Internal Revenue Service

2. NOTICE IS HEREBY GIVEN that the undersigned has filed an objection to your Proof of Claim (Claim # in these bankruptcy cases:

Alan Gomperts Claim #3-1

Daniel Halevy Claim #3-1

Susan Halevy Claim #2-1

Seaton Investments, LLC Claim #1-1

Broadway Avenue Investments, LLC Claim #1-1

SLA Investments, LLC Claim #1-1) filed in the above referenced case. The Objection to Claim seeks to alter your rights by disallowing, reducing or modifying the claim based upon the grounds set forth in the objection, a copy of which is attached hereto and served herewith.

3. **Deadline for Opposition Papers:** You must file and serve a response to the Objection to Claim not later than 14 days prior to the hearing date set forth above.

**IF YOU FAIL TO TIMELY RESPOND IN ACCORDANCE WITH THIS NOTICE, THE COURT MAY GRANT THE RELIEF REQUESTED IN THE OBJECTION WITHOUT FURTHER NOTICE OR HEARING.**

Date: 8/9/24

Saul Ewing LLP

Printed name of law firm

/s/ Zev Shechtman

Signature

Date Notice Mailed: 8/9/2024

Zev Shechtman

Printed name of attorney for objector

## PROOF OF SERVICE OF DOCUMENT

I am over the age of 18 and not a party to this bankruptcy case or adversary proceeding. My business address is: 701 Brickell Avenue, Suite 1700, Miami, Florida 33131.

A true and correct copy of the foregoing document entitled (*specify*): **Amended Notice of Objection to Claim and Memorandum of Point and Authorities and Declarations of Zev Shechtman and Derrick Talerico in Support Thereof** will be served or was served (**a**) on the judge in chambers in the form and manner required by LBR 5005-2(d); and (**b**) in the manner stated below:

**1. TO BE SERVED BY THE COURT VIA NOTICE OF ELECTRONIC FILING (NEF):** Pursuant to controlling General Orders and LBR, the foregoing document will be served by the court via NEF and hyperlink to the document. On (*date*) **August 9, 2014**, I checked the CM/ECF docket for this bankruptcy case or adversary proceeding and determined that the following persons are on the Electronic Mail Notice List to receive NEF transmission at the email addresses stated below:

Tanya Behnam	tbehnam@polsinelli.com, tanyabehnam@gmail.com;ccripe@polsinelli.com;laddocketing@polsinelli.com
Carol Chow	Carol.Chow@saul.com, easter.santamaria@saul.com
Christopher Cramer	secured@becket-lee.com
Michael G Fletcher	mfletcher@frandzel.com, sking@frandzel.com
Todd S. Garan	ch11ecf@aldridgepите.com, TSG@ecf.inforuptcy.com;tgaran@aldridgepите.com
Jacqueline L James	james@hrhlaw.com
Kelly L Morrison	kelly.l.morrison@usdoj.gov
Avi Edward Muhtar	amuhtar@crowndandstonelaw.com
Bruce D Poltrock	bpoltrock@frandzel.com, achase@frandzel.com
Zev Shechtman	Zev.Shechtman@saul.com, zshechtman@ecf.inforuptcy.com;easter.santamaria@saul.com
Derrick Talerico	dtalerico@wztslaw.com, maraki@wztslaw.com,sfritz@wztslaw.com
U.S. Trustee (LA)	ustregion16.la.ecf@usdoj.gov
Gerrick Warrington	gwarrington@frandzel.com, achase@frandzel.com
Jennifer C Wong	bknotice@mccarthyholthus.com, jwong@ecf.courtdrive.com

☐ Service information continued on attached page

### **2. SERVED BY UNITED STATES MAIL:**

On August 9, 2024, I served the following persons and/or entities at the last known addresses in this bankruptcy case or adversary proceeding by placing a true and correct copy thereof in a sealed envelope in the United States mail, first class, postage prepaid, and addressed as follows. Listing the judge here constitutes a declaration that mailing to the judge will be completed no later than 24 hours after the document is filed.

Internal Revenue Service  
P.O. Box 7346  
Philadelphia, PA 19101-7346

Florence M. Perkins  
Bankruptcy Specialist  
Internal Revenue Service  
IRS Insolvency Group 7  
24000 Avila Road, 3rd Floor, M/S 5503  
Laguna Niguel, CA 92677

☒ Service information continued on attached page

**3. SERVED BY PERSONAL DELIVERY, OVERNIGHT MAIL, FACSIMILE TRANSMISSION OR EMAIL** (*state method for each person or entity served*): Pursuant to F.R.Civ.P. 5 and/or controlling LBR, on (*date*) August 9, 2024, I served the following persons and/or entities by personal delivery, overnight mail service, or (for those who consented in writing to such service method), by facsimile transmission and/or email as follows. Listing the judge here constitutes a declaration that personal delivery on, or overnight mail to, the judge will be completed no later than 24 hours after the document is filed.

EMAIL: Florence M. Perkins [Florence.perkins@irs.gov](mailto:Florence.perkins@irs.gov)

☐ Service information continued on attached page

I declare under penalty of perjury under the laws of the United States that the foregoing is true and correct.

August 9, 2024

Zev Shechtman

/s/ Zev Shechtman

Date

Printed Name

Signature

This form is mandatory. It has been approved for use by the United States Bankruptcy Court for the Central District of California.

**2. SERVED BY UNITED STATES MAIL Continued:**

Civil Process Clerk  
United States Attorney's Office  
Federal Building, Room 7516  
300 North Los Angeles Street  
Los Angeles, CA 90012

Attorney General  
United States Department of Justice  
Ben Franklin Station  
P. O. Box 683  
Washington, DC 20044